



REDACTED FOR PUBLIC INSPECTION

September 26, 2016

**Via Hand Delivery**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Accepted / Filed

SEP 26 2016

Federal Communications Commission  
Office of the Secretary

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**Re: Proposal of Google for Certification as a SAS Administrator and ESC Operator;  
Supplemental Information (GN Docket 15-319); Request for Confidential  
Treatment of Question 7**

Dear Ms. Dortch:

Attached please find an original and eight copies of Google's response to Question 7 from the Commission's Request for Supplemental Information dated September 2, 2016, regarding Google's proposal seeking certification to operate as a SAS Administrator and ESC operator in the 3550-3700 MHz Band (3.5 GHz Band). Responses to the remaining questions were submitted via ECFS on September 26, 2016.

Google requests confidential treatment of its response to Question 7 in order to protect its evolving business and technology strategies. The information Google seeks to keep confidential includes ESC controller information and disclosure of such sensitive information could result in substantial competitive harm to Google. Consistent with 47 C.F.R. § 0.459, Google requests notification if release of confidential information is requested pursuant to the Freedom of Information Act or otherwise.

Should you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Stephanie Selmer  
Associate Corporate Counsel

cc: Brian Regan  
Paul Powell  
Becky Schwartz  
Ira Keltz

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Ltr ABCDE



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September 26, 2016

Brian Regan  
Associate Bureau Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Proposal of Google for Certification as a SAS Administrator and ESC Operator;  
Supplemental Information (GN Docket 15-319)**

Dear Mr. Regan:

This letter responds to your Request for Supplemental Information of September 2, 2016, regarding Google's proposal seeking certification to operate as a SAS Administrator and ESC operator in the 3550-3700 MHz Band (3.5 GHz Band).<sup>1</sup> Below, please find Google's response to Question 7 posed by the Commission.

- 7. Discuss in more detail how the ESC controller will detect federal incumbent signals; please include the signal processing algorithms used by the ESC controller. (pg. 55) (SAS / ESC Proposal PN)**

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Please contact me should you have any questions about these responses to your inquiry.

Respectfully submitted,

Stephanie Selmer  
Associate Corporate Counsel

cc: Paul Powell  
Becky Schwartz  
Ira Keltz

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<sup>1</sup> Application of Google Inc. for Certification to Provide Spectrum Access System and Environmental Sensing Capability Services in GN Docket No. 15-319 (filed May 16, 2016) (Google Proposal).